



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 2, 2017

GERALD HUDSON, TREASURER
BLACK PAC
1800 MASSACHUSETTS AVE., NW
WASHINGTON, DC 20036

Response Due Date

04/06/2017

IDENTIFICATION NUMBER: C00609388

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2016 - 10/19/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule B of your report discloses disbursements to "SEIU COPE (SERVICE EMPLOYEES INTERNATIONAL UNION COMMITTEE ON POLITICAL EDUCATION)" and "SEIU General Fund" for "Staff Salaries & Beneifts" and "Staff Salaries & Benefits," respectively. Please be advised that when itemizing disbursements to companies for payroll services, if the payment to the salary recipient aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the salary, as well as the date, amount, and purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)

- Schedule B of your report discloses an expenditure(s) for "Digital Consulting Services." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.